

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

MIAMI DIVISION

RYAN BRESLOW, ALEX FINE, and JON
GORDON,

Plaintiffs,

v.

MARK PHILLIPS and BENJAMIN REED,

Defendants.

Action No.: 23-cv-20727-ALTMAN/Reid

Honorable Roy K. Altman

MOVEMENTDAO and MARK PHILLIPS,

Counterclaim-Plaintiffs

v.

RYAN BRESLOW, ALEX FINE, and JON
GORDON,

Counterclaim-Defendants.

PLAINTIFFS' SUPPLEMENTAL RESPONSE TO MOTION FOR CLARIFICATION

Plaintiffs Ryan Breslow, Alex Fine, and Jon Gordon (“Plaintiffs”) hereby file the following Supplemental Response to the Motion for Clarification, ECF No. 93, pursuant to the Court’s June 9, 2023 Order, ECF No. 109.

Robinhood Markets Inc. (“Robinhood”) has agreed to lift its \$5,000 transfer limit so that Defendants can finally comply with the Court’s Temporary Restraining Order (“TRO”), ECF No. 18.

On June 8, 2023, Defendants’ counsel informed Plaintiffs that they had not heard from Robinhood despite their outreach. On June 9, 2023, the Court issued its Order directing Plaintiffs to provide Robinhood with a copy of the TRO and the June 9 Order. ECF No. 109 at 7. On June 12, 2023, Plaintiffs’ counsel provided Robinhood with the June 9 Order and the TRO. In that correspondence, Plaintiffs’ counsel reiterated the need for Robinhood to remove the \$5,000 daily transfer cap and directed Robinhood to Defendants’ counsel for additional information. On June 13, 2023, Defendants’ counsel informed Plaintiffs that Robinhood would lift the \$5,000 cap and that Defendants would commence returning the TRO assets to the DAO endowment account. However, as of the date of this filing, Defendants still have not returned the over \$2 million in their control. The Dhillon Law Group also has not returned the \$300,000 in TRO assets that it received from Defendants.

Dated: June 16, 2023

John K. Shubin, Esq.
Dylan M. Helfand, Esq.
Jamie L. Katz, Esq.
SHUBIN & BASS, P.A.
150 W Flagler Street, Suite 1420
Miami, FL 33130
Tel.: (305) 381-6060
Fax: (305) 381-9457
Email: jshubin@shubinbass.com
jkatz@shubinbass.com
dhelfand@shubinbass.com

/s/ Benjamin J. Kussman
Christopher T. Berg
Benjamin J. Kussman
Andrew R. Iglesias
ELLIS GEORGE CIPOLLONE
O'BRIEN ANNAGUEY LLP
2121 Avenue of the Stars, 30th Floor
Los Angeles, California 90067
(310) 274-7100
Email: cberg@egcfirm.com
bkussman@egcfirm.com
aiglesias@egcfirm.com

*Attorneys for Plaintiffs Ryan Breslow, Alex
Fine, and Jon Gordon*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served by the Court's CM/ECF system on June 16, 2023 on all counsel of record.

/s/ Jamie L. Katz
Jamie L. Katz